From: <u>Stenger, Wren</u>

To: Coleman, Sam; McDonald, James; Gray, David; Edlund, Carl; Crossland, Ronnie

Subject: FW: UST response to OMB"s questions on Hurricane supplemental request for TX

Date: Thursday, October 26, 2017 11:55:42 AM

FYI. We worked with HQs on the input below in response to more specific information from Texas on what recovery needs are for UST.

From: Vargo, Steve

Sent: Thursday, October 26, 2017 11:53 AM **To:** Stenger, Wren <stenger.wren@epa.gov>

Cc: Snowbarger, Robert <Snowbarger.Robert@epa.gov>

Subject: Fwd: UST response to OMB's questions on Hurricane supplemental request for TX

Begin forwarded message:

From: "Barolo, Mark" < <u>Barolo.Mark@epa.gov</u>>

Date: October 26, 2017 at 11:51:59 AM CDT

To: "Wilbur, Jappifer" < Wilbur, Jappifer@epa.gov

To: "Wilbur, Jennifer" < <u>Wilbur.Jennifer@epa.gov</u>>

Cc: "Hoskinson, Carolyn" < <u>Hoskinson.Carolyn@epa.gov</u>>, "Vargo, Steve"

<<u>Vargo.Steve@epa.gov</u>>

Subject: UST response to OMB's questions on Hurricane supplemental request for TX

Hey Jen,

Below is our response to the request from OMB for additional information. Please let me know whether you need anything more from me today. I will be at the ASTSWMO meeting all afternoon. My cell number is 202/236-0331.

Thanks, Mark

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Unfortunately TX does not have a more precise estimate at this time of the number of impacted UST sites needing funding. Texas prioritized short term emergencies (i.e., wastewater and drinking water issues) before assessing UST sites – and there are thousands of UST sites to assess. For example, they had 61 inoperable DW systems at one point, and 203 water systems on boil water notices. They have made progress on those, but haven't completed that work yet.

However, TX has developed (and recently began implementing) a UST response plan to better assess sites and determine the need for repairs and recovery. See summary of

that response plan below (which is current as of 10/25/17). They are planning to infield start assessments next week in the four counties (Aransas, San Patricio, Calhoun, and Refugio) impacted by the eye of the storm. There are 142 UST sites in those four counties. They estimate approximately 50% of sites in those counties had damage to surface structures. Unsure what that will mean for UST systems.

That said, if OMB needs to limit the supplemental funding request further before TX can complete its response plan, we can work with Texas to identify those counties with the most severe impacts (storm surge and severe flooding). At a minimum, that might narrow down the scope/number of sites of highest concern. We don't have that information right now, but can work to pull it together quickly if that would be helpful.

TCEQ UST Hurricane Harvey Response Plan

The TCEQ plans to provide damage assessment site visits to UST facilities impacted by Hurricane Harvey in order to minimize risk posed by the damage and to help assess needs for repairs and recovery.

To accomplish this goal, TCEQ has:

- Established a website with an online form that UST facilities can fill out to notify the TCEQ about the extent of the damage.
- Sent e-mails and letters to sites in the impacted counties located in the Corpus Christi area, requesting facilities to report on the established webpage. To date, 42 facilities have reported; 2 of these reported damage to their facility.

Moving forward, TCEQ will:

- Send e-mails and letters to sites in the impacted counties in Beaumont and Houston areas, requesting facilities to report on the established webpage.
- Contact facilities directly, prioritizing them according to age of the tank, potential for damage by wind or flooding, and whether they have submitted a Suspected Release form to the TCEQ's Leaking Petroleum Storage Tank program.
- Conduct 550-600 on-site damage assessments through the TCEQ Site Visit Program Contractor to assess needs at the facilities to repair damage and identify resources to help with the repair and provide assistance to the facilities to establish a path to compliance, both with damaged systems and with other compliance issues.

Additional coordination with the LPST program will ensure that those facilities with extreme damage, (i.e. floating tanks, dispensers blown away), are identified and necessary assistance is provided to address significant releases that may have occurred as a result of hurricane damage.